

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

CLERK US DISTRICT COURT  
ALEXANDRIA, VIRGINIA

**Defendants.**

[illegible]

Civil Action No. 1:15CV1028  
LO/ZDD

Defendants CentralNic Limited (“CentralNic”), XYZ.COM LLC (“XYZ”) and Daniel Negari (collectively “Defendants”), by counsel, hereby notice the removal of this action, pursuant to 28 USC §§1332, 1367, 1441, and 1446 *et seq.*, to the United States District Court for the Eastern District of Virginia on the basis of the following facts, which demonstrate the existence of diversity jurisdiction in this Court:

1. On or about March 17, 2015, Plaintiff Verisign, Inc. (“Plaintiff” or “Verisign”) filed its original complaint in that certain civil action pending in the Circuit Court for Fairfax County, Virginia, styled *Verisign v. Key Brand Entertainment, Inc. et al.*, Civil Action No. 2015-03519 (the “Action”). The Complaint named Key Brand Entertainment, Inc., KBE gTLD Holding, Inc. (collectively, “Key Brand Entities”), CentralNic, and Matter Strategic Advisors, LLC as defendants. Because Verisign and the Key Brand Entities are all Delaware corporations, complete diversity did not exist between Plaintiff and Defendants, and the Action was not then removable for that reason.

2. On or about July 15, 2015, Plaintiff filed a Motion to Amend with the First Amended Complaint (“FAC”) attached as an exhibit. The FAC voluntarily dismissed the non-

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diverse Key Brand Entities (and Matter Strategic Advisors, LLC) from the Action, and added XYZ and Daniel Negari as defendants. The Motion to Amend was granted on July 24, 2015, and the FAC was deemed filed. A true and correct copy of the FAC is attached hereto as Exhibit 1.

3. In addition, on July 20, 2015, the Key Brand Entities and Matter Strategic Advisors, LLC were dismissed from the case by Order granting the Plaintiff's Partial Nonsuit.

4. As discussed below, Plaintiff's voluntary dismissal of the Key Brand Entities created complete diversity between Plaintiff and each of the remaining Defendants for the first time in the Action. Thus, by serving CentralNic with the FAC on or about July 15, 2015 and with the FAC adding XYZ and Negari being deemed filed on July 24, 2015, Plaintiff provided Defendants with notice that the Action had become removable. Accordingly, pursuant to 28 USC §1446(b)(3), this Notice of Removal is unquestionably timely because Defendants filed said Notice within 30 days of being served with the FAC.

#### **Diversity Jurisdiction**

5. This Court has jurisdiction over this Action pursuant to 28 USC §1332.

6. As alleged in the FAC, Plaintiff is a Delaware corporation with its principal place of business in Virginia; CentralNic is a United Kingdom corporation with its principal place of business in London, England; XYZ is a Nevada limited liability company with its principal place of business in Nevada; and Negari is a California resident. (FAC, ¶¶1-4) Accordingly, complete diversity of citizenship exists between Plaintiff and Defendants in the Action.

7. By the FAC, Plaintiff seeks a principal sum of damages in the amount of \$1,552,500, plus interest, attorneys' fees and costs, jointly and severally, against Defendants. (FAC, ¶61) Accordingly, the amount in controversy substantially exceeds the \$75,000 jurisdictional minimum amount in controversy prescribed by 28 USC §1332(a).

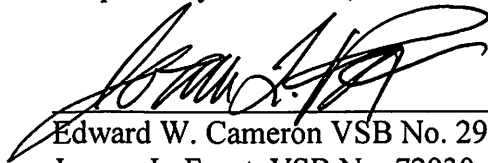
8. Removal to this Court is proper pursuant to 28 USC §1441(a) because the United States District Court for the Eastern District of Virginia embraces the place in which the removed Action was pending.

9. Defendants will promptly file a Notice of Filing of this Notice of Removal with the clerk of the Circuit Court for Fairfax County and will serve the same upon Plaintiff.

10. All Defendants consent to the removal of this action.

**WHEREFORE**, Defendants respectfully request that this Court take jurisdiction over this Action and issue all necessary orders and process to remove said Action from the Circuit Court of Fairfax County to the United States District Court for the Eastern District of Virginia.

Respectfully submitted,



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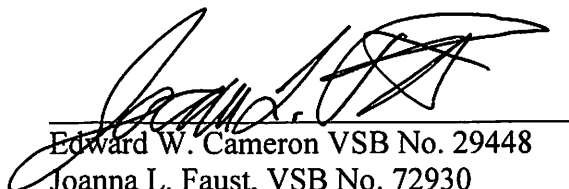
*Counsel for Defendants CentralNic Limited,*

*XYZ.COM LLC and Daniel Negari*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on August 13, 2015 a true and accurate copy of the foregoing was served via electronic mail and first class mail, postage prepaid, upon:

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